LEWIS LAWYERS E-Filed on 4/18/07 3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169-5996 1 Facsimile (702) 949-8321 2 Telephone (702) 949-8320 40 North Central Avenue, Suite 1900 3 Phoenix, Arizona 85004-4429 Facsimile (602) 734-3824 Telephone (602) 262-5756 4 Susan M. Freeman AZ State Bar No. 004199 Email: sfreeman@lrlaw.com
Rob Charles NV State Bar No. 006593 5 Email: rcharles@lrlaw.com John Hinderaker AZ State Bar No. 018024 6 Email: ihindera@lrlaw.com 7 Attorneys for USACM Liquidating Trust 8 UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA 9 In re: Case No. BK-S-06-10725-LBR 10 Case No. BK-S-06-10726-LBR USA COMMERCIAL MORTGAGE Case No. BK-S-06-10727-LBR Case No. BK-S-06-10728-LBR 11 COMPANY, Case No. BK-S-06-10729-LBR 12 USA CAPITAL REALTY ADVISORS, LLC, CHAPTER 11 13 USA CAPITAL DIVERSIFIED TRUST Jointly Administered Under Case No. 14 DEED FUND, LLC, BK-S-06-10725 LBR USA CAPITAL FIRST TRUST DEED 15 STIPULATION CONTINUING FUND, LLC, **HEARING ON OBJECTIONS TO CLAIM 1366 OF LOS VALLES** 16 USA SECURITIES, LLC, LAND & GOLF LLC 17 Debtors. Date of Hearings: April 26, 2007 18 Affects: Time of Hearings: 9:30 a.m. □All Debtors 19 New Date of Hearings: June 15, 2007 ☐ USA Capital Realty Advisors, LLC Time of Hearings: 9:30 a.m. 20 ☐ USA Capital Diversified Trust Deed Fund, LLC ☐ USA Capital First Trust Deed Fund, LLC 21 ☐ USA Securities, LLC 22 USACM Liquidating Trust (the "USACM Trust"), by and through its counsel, 23 Lewis and Roca LLP, and Los Valles Land & Golf LLC ("Los Valles"). by and through its 24 counsel, Akin Gump Strauss Hauer & Feld LLP, hereby stipulate: 25 1. The USACM Trust filed two objections to Claim No. 1366 of Los Valles 26 [DE 3076 and 3168] (the "Objections").

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- 2. The Objections are set for status hearing on April 26, 2007 at 9:30 a.m.
- 3. Counsel for Los Valles is recovering from recent surgery.
- 4. Counsel for the USACM Liquidating Trust requests additional time to investigate the claim and negotiate with the Claimant's counsel over investigation and prosecution of the Claims and the Objections.
 - 5. In order to facilitate that negotiation, the parties agree:
 - The deadline for Los Valles to file a response to the Objections be extended to May 15, 2007;
 - the reply to the response shall be filed and served by June 7, 2007; and
 - the hearing on the Objections filed by the USACM Trust to Claim No.
 1366 of Los Valles be continued to June 15, 2007 at 9:30 a.m.
 - 6. The parties submit a stipulated order for the Court's convenience. DATED: April 18, 2007.

LEWIS AND ROCA LLP

By: /s/ RC (#6593)

Susan M. Freeman, AZ 4199 (pro hac vice)
Rob Charles, NV 6593
John Hinderaker, AZ 18024 (pro hac vice)
Counsel for USACM Liquidating Trust

-and-

AKIN GUMP STRAUSS HAUER & FELD LLP

Drake D. F.

Drake D. Foster

2029 Century Park E, Suite 2400

Los Angeles, CA 90067 Tel: 310-552-6450

Email: dfoster@akingump.com

Attorneys for Los Valles Land & Golf LLC.